

# THE PSYCHOLOGY FOUNDATION OF AUSTRALIA

(Incorporated in New South Wales)

c/o School of Psychology, University of New South Wales, Sydney 2052, NSW, Australia

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29 June 2014

## Re: Consultation Paper 22: requirements for general registration, continuing professional development and recency of practise for psychologists.

The Psychology Foundation of Australia is a grouping of research-oriented university Schools of Psychology that was created to promote high standards in the education of Psychologists and a scientific basis for professional practice. The Psychology Foundation is generally supportive of the current national processes leading to registration. However we take this opportunity to reiterate our long-standing concern that the minimum required level of training leading to general registration (5+1 and 4+2 routes) is below international standards and that a level 9 degree (2 year Masters equivalent) would be a more desirable minimum. In our view the Psychology Board should commit to a minimum level 9 degree requirement for registration in the future, with sufficient lead time to allow current students to complete their training under the existing arrangements – for example, by 2020. Australian Level 9 degrees are already of high standard and are well regulated. Hence, many of the quality issues addressed in this consultation paper would disappear if Level 9 degrees became the standard training pathway.

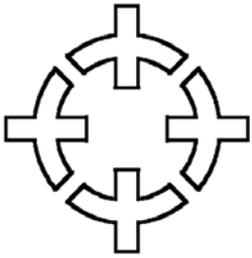
We would also like to make a number of suggestions regarding the remainder of the consultation paper. These are detailed below with the relevant page number indicated.

On page 4 the Board notes the intention to replace the term Masters with '6 years of training'. The paragraph implies, but does not explicitly state, that a 2-year, level 9 degree is intended. We do not accept that 5+1 or 4+2, which could also be construed as 6 years of training, would be a substitute for the term Masters in this context. Hence we recommend retention of the current terminology.

On page 6, paragraph 2 there is reference to the temporary exemption from the National Psychology Examination for higher degree candidates (Level 9 and 10 degree routes). We would like to strongly reiterate our belief that a properly accredited training programme, with its multiple required items and methods of assessment, will always be more adequate in evaluating the suitability of a candidate than a single examination. Furthermore a properly conducted, accredited programme should not require additional assessment and we therefore believe this exemption should be permanent. The considerable administrative burdens and costs associated with requiring Level 9 and 10 graduates to sit the examination would be difficult to justify in terms of any measurable advantages.

## OFFICE ENQUIRIES

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Page 6 also suggests that these guidelines should be subject to a 5 year review cycle. The Foundation agrees that a five year cycle is appropriate. More frequent changes place an unhelpful administrative burden on all parties involved and preclude the ability to properly assess the effect of any changes on candidates completing the level 10 training programmes.

On page 10 of the guidelines the specific hourly requirements for internships are outlined. We have noted, in the past, that given the aim of Psychology to be an evidence-based discipline it would be desirable to indicate why the specific numbers of hours are required. Ideally it would be better to specify particular performance standards that should be met since, conceivably, it would be possible to do many hours without learning particular critical skills. Furthermore since these hours are a quite onerous requirement it needs to be clear that they are all needed. Some implications of the current standards seem hard to defend. For example, the 5+1 route requires exactly half the period of supervised practise of the 4+2 route and yet it seems very unlikely that 1 year of supervised internship is equivalent to 1 year of intensive training in an accredited programme. Of course these judgements are difficult to justify when the specific items to be learnt during internship have not been specified.

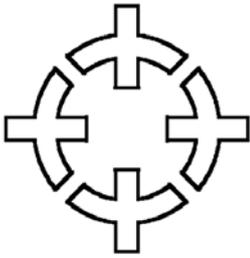
Page 11 provides a definition of sufficient progress in the research thesis, in which it requires the thesis writing to be equivalent in size and scope to a sixth year thesis. While we do not object to this standard we believe it is important that only provisional approval should be given for meeting this criterion since it is a subjective judgement, with final approval being obtained when the thesis is successfully completed.

Page 15 poses the question of whether there should be greater consistency with other National Boards' CPD requirements. Ideally the CPD requirements should be developed using an evidence base which indicates the merits of each of the requirements. Such an evidence base would indicate what was required to maintain an acceptable practise standard and need not be consistent with that required by other boards. Without that evidence base indicating why requirements should vary, then it would be desirable to ensure that CPD requirements are no more onerous for Psychologists than for other groups.

Page 29 provides a list of non-psychologist roles. We do not accept that unregistered academics in psychology, retired psychologists or academics fully trained in psychology but operating in other disciplines should be referred to as "non-psychologist peers" and placed under the same umbrella term as professionals with no psychology background. The relevant paragraph should be altered so that the professionals who are acceptable for consultation are referred to as "academic and retired psychologists

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as well as professionals with non-psychologist roles”.

Additionally on Page 29 there is a recommendation that peer supervision or consultation should occur with someone who is more experienced or knowledgeable in the aspect of practise. Senior practitioners will not always be able to meet this recommendation.

Finally there are two editorial changes required in the consultation paper. On page 14, line 4, the word ‘is’ should be removed. On page 47 , item (d) should say ‘require the applicant’ not ‘require the application’.

We thank you for the opportunity to contribute to this process.

David Badcock

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